although it may be somewhat higher it is usually not higher than 30 kV. In the art of high voltage transmission and distribution, high voltage is on the order of hundreds of kV. Thus, the term has a meaning when examined in context. Applicants have made a machine which operates at high voltage in the transmission and distribution context. This is why Shildneck and the other references are inapplicable. None of the references show or suggest that a flexible cable for high voltage distribution could be employed in a rotating machine to allow such machine to operate at a corresponding high voltage. The references do not suggest such high voltage would be advantageous, nor do they show a need for such high voltage operation. The term high voltage is believed to be a structural term, and not merely a statement of intended use. Applicants believe that the term categorizes the invention in a in a way that has structural implications.

The fact that Elton employs semi-conductive material to reduce corona discharge is not pertinent to the invention. Elton does not recognize that the semi-conducting material is suitable for a high voltage machine. The fact that such material is useful in a transmission cable does not mean it is useful in a high voltage machine. The environment of a high voltage machine is not at all similar to a low voltage machine, nor is it similar to the environment in which a power cable is employed. There is no suggestion that such a substitution would work.

It is important to note that the disclosure in Elton is for a conventional high current, low voltage machine, not a high voltage, low current machine according to the invention. Elton's disclosure is segregated into three embodiments, none of which are considered interchangeable. The winding in the machine of Elton is a winding for a conventional bar type winding in a conventional rotating machine. The cable is a conventional transmission and distribution or power cable. The housing is an insulated housing. There is no suggestion that the cable of Elton is useful in the rotating machine.

The expectation of success is important. If success is not expected why would one seek to make the combination asserted by the Examiner? The reason that Elton's cable would not

work is because it is stiff and it would crack if bent sufficiently to be threaded in a machine. This would cause sites for corona discharge. Thus, the alleged advantage of Elton's cable with semi-conducting material, as asserted by the Examiner, would be defeated. The Applicants' assertions regarding the development of cracks in Elton are substantiated in a related application which is now under appeal, and in which this feature of the prior art is an issue. Applicants argue that Elton's cable would fail, because it could not be made into a winding of a machine.

In Elton, the semi-conducting material is employed with a conventional hard or stiff bar type winding to control corona discharge in the end winding region. The arrangement is a hand crafted structure. The arrangement in Elton's low voltage machine would not work in a high voltage machine. Elton requires a complex structure to control the end winding region as suggested by the drawing figures showing the convoluted structure in the conventional machine. If the arrangement of Elton was attempted in a high voltage context it would not work.

The cable embodiment in Elton is for a transmission and distribution or a power cable. However, there is no suggestion that the cable of Elton could be substituted for the conventional winding to make a high voltage machine. The Examiner's jump to combine the references goes too far. The Elton reference itself does not suggest the advantage of having a machine with a high voltage output other than conventional high voltage operation for rotating machines. In the same reference, Elton employs a semi-conductor for power cables. Elton never suggests that it would be useful or advantageous to substitute one for the other, because Elton does not recognize the possibility of such arrangement. The Applicants believe that the Examiner arrives at his conclusion based on the teachings gleaned from Applicants' disclosure, which amounts to impermissible hindsight.

If the filing of this paper requires an extension, Applicants hereby request such extension and authorize the Commissioner to charge Deposit Account 04-2223 for any required fee or to deposit any refund in said account.

Respectfully submitted,

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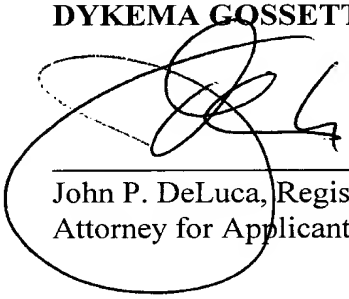

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